

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

DR. THOMAS HUBBARD, PhD,

Plaintiff,

v.

SARAH ALLEN BLAKEMORE and JOHN
DOES 1-10,

Defendants.

Case No. 1:20-cv-767

JOINT MOTION TO ENTER CONFIDENTIALITY AND PROTECTIVE ORDER

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

1. Plaintiff Thomas Hubbard, and Defendant Sarah Blakemore (collectively, the “Parties”), by and through their respective counsel, respectfully request that the Court enter the accompanying Confidentiality and Protective Order, which is in the form set out in Appendix H of the Local Rules for the United States District Court for the Western District of Texas.
2. The Parties respectfully request that the Court enter the accompanying proposed Confidentiality and Protective Order in order to facilitate document disclosure, information disclosure, production, and to protect the Parties’ confidential information.

PRAYER

3. WHEREFORE PREMISES CONSIDERED, the Parties respectfully request that this Court grant this proposed Confidentiality and Protective Order, and for all other relief to which the Parties may be justly entitled in law or equity.

Dated: February 25, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February 2021, a true and correct copy has been electronically filed on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following attorney of record:

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